## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNIVERSITAS EDUCATION, LLC,	)
Petitioner/Judgment Creditor,	)
v.	) Case No. 14-FJ-05-HE
NOVA GROUP, INC.,	)
Respondent/Judgment Debtor,	)
AVON CAPITAL, LLC,	)
Respondent/Judgment Debtor,	)
ASSET SERVICING GROUP, LLC,	)
Respondent/Garnishee,	)
SDM HOLDINGS, LLC,	)
Respondent/Garnishee,	)
and	)
AVON CAPITAL, LLC, a Wyoming Limited Liability Company,	) ) )
Intervenor.	<i>)</i> )

## **RECEIVER'S REPORT**

COMES NOW Ryan Leonard, Receiver of Avon Capital, LLC, a Wyoming limited liability company ("Avon Capital"), and pursuant to this Court's Order [Doc. No. 565], submits this Receiver's Report on the recent findings and activities of the Receiver:<sup>1</sup>

<sup>1</sup> This filing has been delayed several weeks due to the Receiver's spouse having undergone open heart surgery this month out-of-state.

- 1. On or about September 3, 2024, SDM Holdings, LLC (Oklahoma) ("SDM-OK") received a maturity payment in the amount of \$505,280.75.
- 2. As a result of this maturity, as of October 24, 2024, SDM-OK's available cash on hand in its bank account maintained by Asset Servicing Group, LLC ("ASG") was \$425,517.94. Projected premiums for the period of November 2024-January 2025 are \$173,075.09. ASG estimates its expenses for this same prospective period will be \$54,305.61.
- 3. Insurers have filed multiple lawsuits in the preceding several months seeking to interplead maturity proceeds into the Court and/or obtain declaratory relief with respect to various policies within SDM-OK's portfolio. The Receiver, on behalf of SDM-OK, has entered an appearance in each of these actions. In all, there are thirteen (13) pending maturities with a combined face value of \$811,653.00, and total estimated net death benefit of \$1,035,052.64.<sup>2</sup>
- 4. While sufficient funds presently exist to pay SDM-OK's premiums and expenses for the next several months, resolution of the interpleader actions will be necessary to pay premiums and expenses on an ongoing basis. In addition, ASG continues to report that it is receiving "minimal mail," and it is paying many premiums on a projected, rather than an actual basis (because, presumably, mail concerning a number of the policies is being directed to SDM Holdings, LLC (Connecticut)("SDM-CT")). This remains the case despite the manager of SDM-OK and Receiver's multiple and concerted efforts to

2

<sup>&</sup>lt;sup>2</sup> Not all of the pending maturities are the subject of interpleader actions.

ensure all insurers have notice of this Court's various Orders concerning the management of the policies.<sup>3</sup> It is unknown if SDM-CT has received proceeds from maturities unbeknownst to SDM-OK or the Receiver.

5. The Receiver and manager of SDM-OK continue to take all reasonable steps to ensure the policies within SDM-OK's portfolio remain in force, and to ensure compliance with this Court's Orders.

Dated: October 30, 2024.

Respectfully submitted,

s/ Ryan Leonard

Ryan Leonard, OBA #19155 Leonard, Long & Cassil, PLLC 6301 N. Western Ave., Suite 250 Oklahoma City, OK 73118 (405) 367-0555 rleonard@llc-attorneys.com\ RECEIVER

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/ Ryan Leonard

Ryan Leonard

<sup>3</sup> There are approximately 100 individual insurers of policies within the SDM-OK portfolio.

3